

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JUAN PEREZ,

Plaintiff,

v.

THOMAS BASTIS, in his individual and official capacities,

Defendants.

Civil Action No. 1:16-cv-00902-SCJ

JUAN PEREZ'S STATEMENT OF ADDITIONAL MATERIAL FACTS

Under Local Rule 56.1(B)(2)(b), Juan Perez states these additional material facts:

1. Thomas Bastis admits that GP “denied that ... her father[] touched her ... private parts.” Probable Cause Hr’g 23:2–13. But he also testified that she “consistent[ly] ... disclos[ed]” that her father “licked ... the inside of her butt.” *Id.* 6:2–10.

2. Bastis admits that the statement about Mr. Perez licking GP’s bottom is “not true.” Probable Cause Hr’g 10:6–13.

3. Bastis admits that GP “denied that anyone asked or forced her to touch their private parts.” Probable Cause Hr’g 23:15–17.

4. Bastis admits that Amanda Perez's sister said that "she had absolutely no reason to believe ... that [GP's] disclosures were true." Probable Cause Hr'g 15:11–23. In fact, she said the so-called disclosures were "ridiculous." *Id.* 15:23–16:20.

5. The prosecutor assigned to the case testified that GP "specifically den[ied] sexual abuse" multiple times. *See* Gardner Dep. 30:16–21.

6. GP's therapists were, as Detective Carol Largent put it, "required by law to contact [the authorities] ... if the child continued to disclose in a consistent manner." Probable Cause Hr'g 38:5–11. GP's therapists—including Dr. Asia Gifford—did not do so. *Id.* 48:7–49:3.

7. Largent testified that Amanda and Aida Perez's allegations about Mr. Perez were really about money, not sexual abuse. Probable Cause Hr'g 34:7–13.

8. Based on GP's interview and medical exams, the Department of Family and Children Services closed their investigation. Probable Cause Hr'g 47:4–13.

Dated: April 11, 2018

Respectfully submitted,

/s/ Andre T. Tennille III

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Counsel for Juan Perez

CERTIFICATE OF COMPLIANCE WITH LR 5.1B

I certify that Juan Perez's Statement of Additional Material Facts has been prepared in 13-point Century Schoolbook font.

Dated: April 11, 2018

/s/ Andre T. Tennille III

Andre T. Tennille III

Georgia Bar No. 940510

CERTIFICATE OF SERVICE

Today, I electronically filed Juan Perez's Statement of Additional Material Facts with the Clerk of Court using the CM/ECF system, which automatically serves all counsel of record.

Dated: April 11, 2018

/s/ Andre T. Tennille III

Andre T. Tennille III

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